

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	NO. 4:15-CR-00404-HEA-NAB
vs.	)	
	)	
MAURICE WOODSON	)	
	)	
Defendant.	)	

**MOTION TO CONTINUE**

COMES NOW defendant, Maurice Woodson, by counsel, and moves for additional time to file pretrial motions. In support thereof, defendant states as follows:

1. Defendant's pretrial motions are due July 1, 2019.
2. Defendant's motions hearing is set for September 3, 2019.
3. Counsel for defendant were recently appointed in this complex case.
4. Counsel and defendant require additional time to review discovery and to discuss the preparation of the defense of his case.
5. AUSA Thomas Rea has no objection to this motion.
6. The interests of justice are served by this motion.

WHEREAS, Defendant moves for an additional 60 days to file pretrial motions and consequently moves to continue the scheduled hearing or any motions to a later date.

MICHAEL S. GHIDINA, P.C.

By: /s/ Michael S. Ghidina  
MICHAEL S. GHIDINA  
The Midvale Building  
112 South Hanley  
St. Louis, Missouri 63105-3418  
(314) 726-6106  
(314) 863-3821 (Fax)

ATTORNEY FOR DEFENDANT

and

By: /s/ Brian Trentman  
Brian Trentman  
1549 Townshipline Road  
DuBois, Illinois 62831

ATTORNEY FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Michael S. Ghidina  
Michael S. Ghidina